

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In re:

JAMES F. MCAULIFFE,

Debtor.

CHAPTER 7

CASE NO. 16-11089-MSH

JOHN O. DESMOND, CHAPTER 7
TRUSTEE FOR THE ESTATE OF
JAMES F. MCAULIFFE

Plaintiff,

v.

ROBIN S. GILBERT,

Defendant.

ADVERSARY PROCEEDING
NO. 16-01164-MSH

JOINT MOTION TO AMEND THE DISCOVERY PLAN

The plaintiff John O. Desmond, the duly appointed Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of James F. McAuliffe. (the “Debtor”) and the Defendant, Robin S. Gilbert (the “Defendant”) (collectively the “Parties”) hereby move to amend the Parties’ Court-approved Discovery Plan in this case for the purpose of extending all current deadlines set forth therein by sixty (60) days.

In support of this Motion, the Parties state as follows:

1. On March 28, 2016, the Debtor filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code.
2. On March 29, 2016, the Trustee was appointed as the Chapter 7 trustee of the Debtor’s bankruptcy estate.